

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>UNITED STATES OF AMERICA</b>	§	
<b>V.</b>	§	<b>CASE NO. 18-CR-00022-2</b>
<b>ERIKA CASTILLO-GUAJARDO (2)</b>	§	

**DEFENDANT’S UNOPPOSED MOTION TO TRAVEL  
BEYOND THE SOUTHER DISTRICT OF TEXAS**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**COMES NOW** Defendant Erika Castillo-Guajardo, by and through her attorney of record, E. Matthew Leeper, III, and respectfully moves this Honorable Court to grant Defendant permission to travel to San Antonio, Texas, for the following reasons to wit:

I.

Ms. Castillo-Guajardo wishes to assist and chaperone her eleven-year old son who is both competing and performing in the Baile International Grand Salsa Festival being held at the San Antonio Marriott Rivercenter. If this motion is granted, Ms. Castillo-Guajardo plans to leave Houston with her son on July 18<sup>th</sup>, 2019 and return to the Houston area in the late afternoon hours on July 22<sup>nd</sup>, 2019. Attached to this motion are both the child performer and parent of child performer passes.

II.

Defense counsel has consulted with AUSA Kenneth Cusick via electronic mail and he has no objection to the requested travel.

For the foregoing reason, Defendant respectfully prays that this Honorable Court grant her

request to travel to San Antonio, Texas.

Respectfully submitted,  
E. Matthew Leeper, III  
E. Matthew Leeper, III  
OBA #31622  
5225 Katy Fwy. Suite 305  
Houston, TX 77007  
Phone No. (713) 228-6141

**CERTIFICATE OF CONFERENCE**

I certify that I consulted with AUSA Kenneth Cusick on June 5th, 2019 and he is unopposed to this Motion To Travel.

/s/ Emmett Matthew Leeper, III  
Emmett Matthew Leeper, III

**CERTIFICATE OF SERVICE**

I, E. Matthew Leeper, III, hereby certify that on this 10th day of June, 2019, I provided a true and correct copy of Defendant's Motion to Travel beyond the Southern District of Texas by electronic mail to Assistant United States Attorney Kenneth Cusick.

/s/ E. Matthew Leeper, III  
E. Matthew Leeper, III